

# Allegheny County Health Department

## COUNTY COMMISSIONERS

Bob Cranmer  
Chairman

Mike Dawida

Larry Dunn



301 39th St  
Pittsburgh, PA 15201

June 17, 1998

Bruce W. Dixon, M.D.  
Director

Roger C. Westman, Ph.D.  
Air Quality Manager

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JUN 25 1998

Division Director (3AP00)

Thomas Goettge, Plant Manager  
USS Clairton Works  
USX Corporation  
400 State Street  
Clairton, PA 15025

RE: Settlement Offer; Statement of Violations No. 980602;  
USS Clairton Works; January - March 1998

Dear Mr. Goettge:

A Statement of Violations with regard to the USX Corporation USS Division Clairton Works, 400 State St., Clairton, 15025 (USX), has been turned over to my office for appropriate enforcement action. Specifically this letter addresses the alleged violations, observed by County Inspectors and from USX reports, of various provisions of Article XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control ("Article XXI"), at your company's Clairton Works during the first quarter January 1, 1998, through March 31, 1998.

This letter also constitutes an offer to settle these alleged violations, without the cost and burden of litigation, by payment of a civil penalty to the County in the amount of \$4,725 by no later than 30 days from the date of this letter.

These alleged air pollution control violations at your Allegheny County Clairton Works, including Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, 19, 20, and B, involve the following:

- Excessive visible emissions from the charging of the coke ovens on Battery 13 in violation of §2105.21.a.1 of Article XXI; and

Thomas Goettge, Plant Manager  
USX Corporation  
SOV No. 980602  
Page 2

- Excessive visible emissions from the pushing of coke from Batteries 1, 9, 19, and B, in violation of §2105.21.e.4 of Article XXI; and
- Excessive visible emissions from the transport of coke from Battery 19 in violation of §2105.21.e.5 of Article XXI.

Summaries of the alleged violations and the basis for this settlement offer are enclosed with this letter. If USX chooses to accept this offer, a civil penalty payment in the amount of \$4,725, by check payable to the "Allegheny County Clean Air Fund", must be received by this office, to my attention at the address above, by no later than the deadline indicated above. If such penalty payment is made in accordance with this offer, the County, by this letter, hereby agrees to accept such penalty in full satisfaction of all violations alleged herein, without any final determination of law or fact, and hereby agrees to not seek any further penalties or remedial actions for such alleged violations.

The County prefers to settle alleged violations such as these rather than initiating litigation. A failure to accept this settlement offer by the deadline stated, however, will result in formal enforcement action by the County, which could include the filing of summary criminal complaints before the designated district justice.

In addition, the settlement terms acceptable to the County will increase after such deadline since additional enforcement resources will be committed to this matter.

The amount of the civil penalty payment from your company which has been offered to settle these violations in the above-referenced areas is based on the nature, severity, and frequency of the alleged violations, on the potential summary criminal penalties, upon conviction, of \$100 to \$2,500 per violation per day, and on the potential civil penalties of up to \$25,000 per violation per day. Also considered are such things as the health effects of the pollutants involved, the apparent willful or

Thomas Goettge, Plant Manager  
USX Corporation  
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inadvertent nature of the violations, any potential impacts on the public, any actions taken, or being taken by your company (that have been reported to the County) to minimize the violations or to prevent future violations, the level of success of such actions, and the compliance history of the source.

Thank you for your anticipated prompt attention to this matter.

Very truly yours,



Roger C. Westman, Ph.D.  
Air Quality Manager

encl.

cc: Bruce W. Dixon, M.D.	(w/ encl.)
Stephen K. Todd	( " " )
USX Corp.	
William S. Kubiak	( " " )
USX Corp.	
H. R. McCollum	( " " )
USX Corp.	
Joseph Pezze	( " " )
PA DEP, Pgh.	
Judith Katz	( " " )
US EPA Reg. III, Phila.	
Sandra L. Etzel	( " " )
William U. Clark	( " " )
Henry Miller III	( " " )

ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM  
USX CORPORATION - USS CLAIRTON WORKS  
Coke Plant Performance Data

1st Quarter (January, February, March) 1998

SUMMARY

<u>Source</u>	<u>Violations</u>					<u>Civil Penalty Settlement Offer</u>
	<u>(except as noted)</u>	<u>non-de minimis</u>				
Visible Emissions						
Charging	1	1	x	\$375.00	= \$	375.00
Door Areas	0	0				
Charging Ports	0	0				
Offtake Piping	0	0				
Pushing						
with control device 20% Opacity Std.	6	6	x	\$500.00	= \$3,000.00	
transport w/o control 10% Opacity Std.	3	3	x	\$450.00	= \$1,350.00	
Combustion Stacks						
20% Opacity Std.	0	0				
60% Opacity Std.	0	0				
Pushing Control Unavailability 1.01%		0 (a.)				
Coke Oven Gas Desulfurization						
Performance	0	0				
Unavailability (b)	5.68%					
Breakdown Reporting	0	0				
Flaring of Raw Coke Oven Gas	3 (c,d)	0				
Venting of Raw Coke Oven Gas	0 (c,d)	0				
Monthly & Monitoring Reports (timeliness, completeness, etc.)	0	0				
Total	13+	10				

\$4,725.00

- (a) Based on individual battery unit monthly performance.  
 (b) Unavailability of part of the desulfurization unit may not cause an exceedance of the standard; desulfurization was in compliance 100% of the time (90 of 90 days) during the first quarter 1998.  
 (c) Number of battery 15-minute periods, or part thereof.  
 (d) Flaring: 7 battery-minutes; venting (unflared): 0 battery-minutes.

ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM  
USX CORPORATION - USS CLAIRTON WORKS  
Coke Plant Performance Data

1st Quarter (January, February, March) 1998

<u>SOURCE</u>	<u>BATTERY</u>	<u>DATE</u>	<u>OBSERVATIONS</u>
<u>Visible Emissions</u>			
Charging	13	03/05	139 secs.
Door Areas			NO VIOLATIONS
Charging Ports			NO VIOLATIONS
Offtake Piping			NO VIOLATIONS
Pushing			
w/control device	19	01/14	18 secs. $\geq 20\%$ (100% max.)
20% standard	19	01/14	26 100
	19	01/14	40 100
	01	02/02	26 100
	09	03/03	13 50
	B	03/26	35 65
transport in	19	01/14	11 40
open atmosphere	19	01/14	16 40
10% standard	19	01/14	25 100
Combustion Stacks			
20% standard			NO VIOLATIONS
60% standard			NO VIOLATIONS

ALLEGHENY COUNTY HEALTH DEPARTMENT  
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USX CORPORATION - USS CLAIRTON WORKS  
Coke Plant Performance Data

1st Quarter (January, February, March) 1998

Pushing Control System Unavailability

Battery No.	Uncontrolled Pushes	
	Month/Year	%
1,2,3	01/98	1.99
	02/98	0.72
	03/98	0.30
7,8,9	01/98	0.44
	02/98	2.21
	03/98	3.02
13,14,15	01/98	0.31
	02/98	1.21
	03/98	0.35
19 & 20	01/98	0.33
	02/98	2.25
	03/98	0.47
B	01/98	0.00
	02/98	0.00
	03/98	0.00

Total Pushes ( 12 Batteries ): 93,341

Coke Oven Gas Desulfurization

	Bat. No.	Date
Performance	all	NO VIOLATIONS
Unavailability	all	01/27 02/09-13,17

Total: 6 24-hr period(s), or  
part thereof, w/o full use of  
the desulfurization process.

Note: During the first quarter 1998, desulfurization was in compliance 100% of the time on a daily average basis (90 of 90 days). Unavailability of part of the desulfurization unit, which may include redundant equipment, may not cause an exceedance of the standard.

Delayed Breakdown Reporting

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ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM  
USX CORPORATION - USS CLAIRTON WORKS  
Coke Plant Performance Data

1st Quarter (January, February, March) 1998

Venting/Flaring of Raw Coke Oven Gas

<u>Emission Incident (date)</u>	<u>Notes</u>	<u>Battery (No.)</u>	<u>Emission (start and end time)</u>	<u>Periods(a.) of Emission</u>	<u>Emission (vented or flared)</u>
02/18/98	-	07	2030:00-2030:00	1 ( 5 sec.)	Flared
03/03/98	-	14	0925:00-0925:00	1 (55 sec.)	Flared
03/28/98	-	20	1510:00-1516:00	1 ( 6 min.)	Flared

- a. Number of battery-15-minute periods or part thereof, of emission(s).
- b. Incidents (flaring only) less than 2 minutes duration not reported in real time, but summarized in Process Information Report submitted monthly to ACHD-AQP by USS.
- c. Intermittent/non-continuous flaring.

Monitoring/Monthly Reports

NO VIOLATIONS

ALLEGHENY COUNTY HEALTH DEPARTMENT  
 AIR QUALITY PROGRAM  
 Coke Plant Enforcement Data  
 USX CORPORATION - USS CLAIRTON WORKS

1st Quarter (January, February, March) 1998

<u>SOURCE</u>	<u>TOTAL INSPECTIONS</u>	<u>VIOLATIONS</u>	<u>COMPLIANCE</u>
CHARGING	44	1	97.7%%
DOOR AREAS	47	0	100
CHARGING PORTS	48	0	100
OFFTAKES	48	0	100
PUSHING			
Push    ≥ 20%	50	6	88.0
Travel > 10%	50	3	94.0
STACKS			
≥ 20%	106	0	100
≥ 60%	106	0	100

04/15/98



ACHD COKE PLANT PERFORMANCE DATA - USS CLAIRTON (2nd QTR. 1996 THROUGH 1st QTR. 1998)

<u>SOURCE</u>	<u>2Q96</u>	<u>3Q96</u>	<u>4Q96</u>	<u>1Q97</u>	<u>2Q97</u>	<u>3Q97</u>	<u>4Q97</u>	<u>1Q98</u>
<b>Charging %</b>	<b>93.9</b>	<b>100</b>	<b>100</b>	<b>96.6</b>	<b>93.8</b>	<b>100</b>	<b>100</b>	<b>97.7</b>
Insp.	33	45	50	59	48	55	35	44
Viols.	2	0	0	2	3	0	0	1
<b>Door Areas %</b>	<b>100</b>	<b>97.9</b>	<b>96.3</b>	<b>100</b>	<b>96.2</b>	<b>100</b>	<b>100</b>	<b>100</b>
Insp.	28	47	54	58	52	54	33	47
Viols.	0	1	2	0	2	0	0	0
<b>Charging Ports %</b>	<b>100</b>	<b>100</b>	<b>98.1</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>
Insp.	33	48	53	63	50	57	36	48
Viols.	0	0	1	0	0	0	0	0
<b>Offtakes %</b>	<b>100</b>	<b>100</b>	<b>96.2</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>
Insp.	33	48	53	63	50	57	36	48
Viols.	0	0	2	0	0	0	0	0
<b>Pushing (Push) %</b>	<b>97.8</b>	<b>95.3</b>	<b>97.9</b>	<b>89.2</b>	<b>100</b>	<b>88.7</b>	<b>88.6</b>	<b>88.0</b>
Insp.	46	43	48	93	49	53	35	50
Viols.	1	2	1	10	0	6	4	6
<b>Pushing (Trav) %</b>	<b>97.8</b>	<b>97.7</b>	<b>100</b>	<b>98.9</b>	<b>100</b>	<b>92.5</b>	<b>94.3</b>	<b>94.0</b>
Insp.	46	43	48	93	49	53	35	50
Viols.	1	1	0	1	0	4	2	3
<b>Stacks (&gt;20%) %</b>	<b>98.6</b>	<b>98.2</b>	<b>98.8</b>	<b>94.9</b>	<b>98.7</b>	<b>100</b>	<b>97.4</b>	<b>100</b>
Insp.	72	109	81	78	78	94	76	106
Viols.	1	2	1	4	1	0	2	0
<b>Stacks (&gt;60%) %</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>
Insp.	72	109	81	78	78	94	76	106
Viols.	0	0	0	0	0	0	0	0

% - percentage of inspections in compliance  
 Insps. - no. of inspections  
 Viols. - no. of violations

# Allegheny County Health Department

## COUNTY COMMISSIONERS

Larry Dunn, M.D.  
Chairman

Bob Cranmer

Mike Dawida



301 39th St.  
Pittsburgh, PA 15201-1891

July 31, 1997

Bruce W. Dixon, M.D.  
Director

Roger C. Westman, Ph.D.  
Air Quality Manager

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AUG 12 AM

AIR ENFORCEMENT BRANCH  
PA 15025

RE: Settlement Offer; Statement of Violations No. 970701;  
USS Clairton Works; January - March 1997

Dear Mr. Goettge:

A Statement of Violations with regard to the USX Corporation USS Division Clairton Works, 400 State St., Clairton, 15025 (USX), has been turned over to my office for appropriate enforcement action. Specifically this letter addresses the alleged violations, observed by County Inspectors and from USX reports, of various provisions of Articles XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control ("Article XXI"), at your company's Clairton Works during the first quarter January 1, 1997, through March 31, 1997.

This letter also constitutes an offer to settle these alleged violations, without the cost and burden of litigation, by payment of a civil penalty to the County in the amount of \$7,300 by no later than 30 days from the date of this letter.

These alleged air pollution control violations at your Allegheny County Clairton Works, including Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, 19, 20, and B, involve the following:

- Excessive visible emissions from the charging of Battery 8 in violation of §2105.21.b of Article XXI; and